

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: Target Corporation Customer
Data Security Breach Litigation,

MDL No. 14-2522 (PAM/JJK)

This document relates to all actions.

**AGENDA FOR INITIAL CASE
MANAGEMENT CONFERENCE**

The Court will hold an initial case management conference in this matter on Wednesday, May 14, 2014, at 11:00 am in Courtroom 7D of the Warren E. Burger Federal Building and U.S. Courthouse, 316 N. Robert St., St. Paul, Minnesota. The following agenda will govern the proceedings at the case management conference.

- I. Introductions
- II. Status of current cases
 - A. number of cases currently pending/total anticipated to be transferred to MDL
 - B. motions pending in transferred actions
 - C. grouping of cases
 1. consumer
 2. financial institutions
 3. shareholder derivative
 4. cases with more than one type of plaintiff
 - D. continuation of stay/duration thereof
- III. Consolidated and/or amended pleadings

- A. whether master complaint or complaints will or should be filed
- B. initial disclosures
- C. discovery issues and management
- D. early motion practice
 - 1. Local rules and Court's standing order
 - 2. motions to remand anticipated?
- E. dealing with class action allegations and motion practice

IV. Lead & Liaison Counsel

- A. supervising and for each type of case
- B. necessity of appointing Executive Committee and other steering committees
- C. appointment for one year, subject to reappointment by the Court
- D. submission of monthly bills for in camera review
- E. submission of time to date by all counsel within 30 days

V. Scheduling Order

- A. Discovery plan
 - 1. protective order
 - 2. electronic discovery
 - 3. document repository and search-capable document production format
 - 4. coordination with state court litigation, if any
 - 5. coordination among the different types of cases and whether discovery should proceed similarly in all types or on different schedules

6. phases of discovery
7. expert witnesses
8. trial dates

VI. Going Forward

- A. website: www.mnd.uscourts.gov/MDL/Target
- B. Communication with Court
 1. Judge Magnuson
 - a. Calendar Clerk: Suzanne Ruiz 651-848-1156
 - b. chambers' e-mail: magnuson_chambers@mnd.uscourts.gov
 2. Judge Keyes
 - a. Calendar Clerk: Jackie Phipps, 651-848-1180
 - b. chambers' e-mail: keyes_chambers@mnd.uscourts.gov
- C. regularly scheduled status conferences
 1. only lead/liaison counsel need attend in person, unless Court directs otherwise
 2. Ex parte communications by Court
 3. First status conference to be scheduled
- D. Settlement Conferences/Mediation

The Court **DIRECTS** the Clerk to send a copy of this Order to the Clerk of the Judicial Panel on Multidistrict Litigation and counsel of record.

IT IS SO ORDERED.

Dated: May 7, 2014

s/ Paul A. Magnuson

Paul A. Magnuson
United States District Court Judge